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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 ARGONAUT MIDWEST INSURANCE
13 COMPANY, a Nebraska Corporation,

14 Plaintiff,

15 v.

16 YOU MOVE WE MOVE, INC., a Nevada
17 Corporation, ALFONSO PEREZ-GARCIA, a
18 Nevada resident, JOSE DE JESUS IBARRA, a
19 Nevada resident, DOES 1-20, DOE
20 CORPORATIONS 1-20,

21 Defendants.

Case No.: 2:25-cv-00376-CDS-NJK

**STIPULATION AND PROPOSED
ORDER TO SET ASIDE CLERK'S
DEFAULT**

22 Plaintiff ARGONAUT MIDWEST INSURANCE COMPANY ("Plaintiff") and Defendants
23 ALFONSO PEREZ-GARCIA and JOSE DE JESUS IBARRA ("Defendants") stipulate as follows:

- 24 1. The clerk's default entered against Defendant ALFONSO PEREZ-GARCIA on June 18, 2025
25 [ECF No. 15] will be set aside.
26 2. The clerk's default entered against Defendant JOSE DE JESUS IBARRA on June 18, 2025
27 [ECF No. 16] will be set aside.

28 . . .

3. Defendants will file a responsive pleading on Friday, June 27, 2025.

Dated this 23rd day of June 2025.

Dated this 23rd day of June 2025.

FREEMAN MATHIS & GARY, LLP

RALPH A. SCHWARTZ, P.C.

/s/ Kathy A. McCarthy
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Ibarra

ORDER

IT IS SO ORDERED.

DATED June 24, 2025



UNITED STATES ~~DISTRICT~~ MAGISTRATE JUDGE